

**EXHIBIT A**

State of Illinois                     )  
  ) ss  
County of St. Clair                )

**UNSWORN DECLARATION UNDER PENALTY OF PERJURY**  
**IN SUPPORT OF COMPLAINT FOR FORFEITURE**

I, Tyler Mansfield, do hereby depose and declare under penalty of perjury the following:

1. At all times relevant herein, I have been a Task Force Officer (TFO) with the Drug Enforcement Administration. The contents of this Declaration are based on information provided to me during the course of my investigation from participants in the criminal activity, from other witnesses, and from other law enforcement officers.

2. On July 23, 2015, Illinois State Police Trooper Eli Adams (Trooper Adams) conducted a traffic stop on a semi-truck driven by Conrad VALDEZ. The semi-truck was identified as a blue Freightliner, VIN: 1FUJA6CV26LV04593, with Valdez Trucking labeled on the side doors. At the time of the traffic stop the semi-truck was not hauling a trailer. During the course of the traffic stop VALDEZ gave conflicting statements concerning his travel plans and destination, which was suspicious to Trooper Adams. Agents with the Drug Enforcement Administration arrived to assist Trooper Adams. A search of the semi-truck yielded a glass pipe with residue. Agents also noticed some tooling and new bolts on the truck which led agents to believe VALDEZ may have concealed contraband. A check of VALDEZ's criminal history indicated he had been involved in narcotics trafficking in the past.

3. Trooper Adams and agents relocated the traffic stop to the Illinois State Police Training Academy. Trooper Adams transported VALDEZ. VALDEZ explained that he wished to speak with an agent concerning his criminal activity.

4. Agents spoke with VALDEZ. VALDEZ was hesitant to speak his involvement in criminal activity; however after speaking with agents for a short time, VALDEZ explained the intention of his travel. VALDEZ stated that he had driven from Selma, California to Joliet, Illinois. VALDEZ advised that he transported approximately 13 kilos of suspected cocaine to the Pilot gas station in Joliet, Illinois. VALDEZ stated that he transported the 13 kilos of cocaine at the direction of a Hispanic male named "David." VALDEZ further explained that he was advised to contact another Hispanic male to take delivery of the 13 kilos of cocaine and that the second Hispanic male would return with the money.

5. Agents asked VALDEZ how many trips he had made in the past. VALDEZ stated he had made approximately two other trips for "David." VALDEZ said approximately six months ago he transported approximately 20 kilos of suspected ice methamphetamine to Joliet, Illinois from California. VALDEZ stated that on that particular trip he was transporting a legitimate load, which required him to make a delivery on the east coast. VALDEZ stated that he traveled back to Joliet, Illinois approximately one week later and met with the Hispanic male near Odell, Illinois. VALDEZ stated he received a suitcase full of United States currency and that the suitcase was so heavy VALDEZ could barely lift it. VALDEZ estimated the value of the United States currency in the suitcase at \$500,000. VALDEZ said he observed several vacuum sealed packets within the suitcase which contained the United States currency. VALDEZ informed agents that he transported the money back to "David" in California.

6. VALDEZ stated that approximately three months ago he transported approximately 20 kilos of suspected cocaine from California to Joliet, Illinois at the direction of "David." VALDEZ stated that on that particular trip he was transporting a legitimate load, which required

him to make a delivery on the east coast. VALDEZ stated that he traveled back to Joliet, Illinois approximately one week later and met again with the Hispanic male near Joliet. The Hispanic male transferred a duffle bag to VALDEZ containing suspected United States currency. VALDEZ estimated the value at \$100,000. VALDEZ stated the money was vacuum sealed in plastic bags. VALDEZ informed agents that he transported the money back to "David" in California.

7. Agents checked "David's" phone number through a DEA database. The information on the database indicated that "David's" phone number had been in direct contact with a suspect in Ohio who had 5 kilos of heroin seized from him in July of 2015.

8. On September 27, 2015, Illinois State Police Trooper Dustin Weiss, who is also a Task Force Officer (TFO) with the Drug Enforcement Administration (TFO Weiss) spotted a possible target that was a self-admitted drug trafficker. Due to an active investigation involving VALDEZ, a possible vehicle was identified as a vehicle that VALDEZ might be in. The vehicle was a blue 2006 Freightliner with the trucking company Valdez Trucking. Agents were using electronic surveillance to keep track of where VALDEZ was at. The vehicle was located on Interstate 70 near Interstate 57 in Effingham County, Illinois.

9. TFO Weiss observed the truck drive onto and over the right shoulder line and back two times within a mile. TFO Weiss ran the US DOT number on the side of the truck and learned that the US DOT was not authorized to be used for CMV purposes. TFO Weiss activated his emergency lights and conducted a lawful traffic stop for improper lane usage and to also conduct a Level 3 truck inspection on Interstate 70 near milepost 103 in Effingham County, Illinois.

10. TFO Weiss approached the truck tractor and spoke to the driver, via a passenger side approach. The driver provided a California driver's license and was identified as Conrad



VALDEZ. TFO Weiss recognized VALDEZ from the previous stop that was made on VALDEZ about two months prior near Springfield, Illinois.

11. TFO Weiss informed VALDEZ that the reason for the traffic stop was to complete a Level 3 inspection of his log book and for improper lane usage. TFO Weiss observed VALDEZ on the phone and VALDEZ appeared to be extremely nervous. VALDEZ's hands were shaking when he handed TFO Weiss his driver's license. TFO Weiss could also observe VALDEZ sweating profusely. Based on TFO Weiss' initial contact with VALDEZ, VALDEZ appeared more nervous than most traffic stops TFO Weiss observes on a daily basis. TFO Weiss decided to leave VALDEZ in the truck while TFO Weiss issued a written warning to VALDEZ.

12. Illinois State Police Troopers Peyton and Schnarre, along with Altamont K9 Officer Doug Holman, arrived on scene to assist TFO Weiss. Troopers Peyton and Schnarre asked VALDEZ to exit the truck and to come back to TFO Weiss' patrol car. VALDEZ did not want to come out of the truck at first, but eventually did so without any force being used.

13. After VALDEZ exited the truck, Officer Holman deployed his K9 Bullet. Officer Holman started to walk K9 Bullet around in counter clockwise starting at the front passenger side. As K9 Bullet got past the fuel tank located on the driver's side, Officer Holman noticed K9 Bullet's head snap and K9 Bullet went underneath the truck. K9 Bullet then jumped up and placed his front feet on part of the frame of the truck and with his right foot he began to scratch at the bottom of the cab and also started to bark. The location where K9 Bullet was scratching would have been below the sleeper part of the truck. K9 Bullet is trained as an aggressive alert dog and scratching is the way he alerts. Officer Holman informed agents of K9 Bullet's positive alert and then placed K9 Bullet back in the patrol vehicle.

14. TFO Weiss then conducted a probable cause search of the truck and located approximately 20 kilograms (44 pounds) of suspected heroin in two bags underneath the bottom bunk of the truck tractor. TFO Weiss informed the other officers on scene of what he observed in the truck and advised them to arrest VALDEZ.

15. VALDEZ was read his Miranda Rights. VALDEZ stated that he understood his rights and would speak with agents. Agents informed VALDEZ that TFO Weiss had located a substantial amount of narcotics in VALDEZ's vehicle. VALDEZ nodded his head yes. Agents asked VALDEZ where he was travelling to and VALDEZ stated the same place he was coming from on July 23, 2015. Agents asked if it was Joliet, Illinois and VALDEZ stated yes. Agents asked VALDEZ why he was traveling east on Interstate 70. VALDEZ stated he did not wish to pass by Springfield, Illinois because he was stopped there last time. VALDEZ explained he was going to Indianapolis, Indiana and he would proceed north toward Joliet, Illinois on Interstate 65.

16. Agents asked VALDEZ how much narcotics were in his truck. VALDEZ explained he believed 18 kilograms. VALDEZ said he was supposed to drop off 13 kilograms to "Jose" in Joliet, Illinois. VALDEZ further stated that he was directed to drive to New Jersey, after delivering in Joliet, to drop off an additional 5 kilograms. VALDEZ stated he was couriating the narcotics at the direction of "David" who resides in California. VALDEZ further stated that on September 23, 2015, "David" arrived at VALDEZ's house in California and dropped off two bags containing the narcotics. VALDEZ stated that "David" told VALDEZ to drive to Joliet, Illinois and drop off 13 kilograms to "Jose." "David" then informed VALDEZ to travel to New Jersey after that and drop off the remaining kilograms to an unknown subject. VALDEZ explained that after he dropped off the remaining kilograms in New Jersey, he was supposed to drive back to Joliet,


Illinois to pick up drug proceeds (estimated at \$500,000 in United States currency) from "Jose." VALDEZ stated he was supposed to make approximately \$11,000 for transporting the narcotics cross country. VALDEZ stated that he was directed by "David" to take his payment out of the drug proceeds obtained in Joliet, Illinois. Agents asked VALDEZ if he knew the type of drugs he was transporting. VALDEZ stated that he did not. VALDEZ stated that he knew the source of supply in Mexico. Agents noted that while speaking with VALDEZ, VALDEZ was sweating profusely and was extremely nervous.

17. Agents conducted a field test on the suspected narcotics, which tested positive for heroin. A complete search of the truck was also conducted. Agents recovered a notebook along with five cellular telephones.

18. Declarant believes, as a result of the foregoing, that VALDEZ used the 2006 blue Freightliner, bearing VIN: 1FUJA6CV26LV04593 to haul controlled substances as well as proceeds of the sale of said controlled substances, in order to facilitate the sale of controlled substances.

19. Declarant further believes that the 2006 blue Freightliner, bearing VIN: 1FUJA6CV26LV04593, with all accessories, attachments and components thereon constitutes a conveyance which was used or intended to be used, to transport, or in any manner to facilitate the transportation, sale, receipt, possession or concealment of a controlled substance, and is thus subject to forfeiture to the United States pursuant to 21 U.S.C. § 881(a)(4).

Executed on this 10 day of December, 2015.

  
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TYLER MANSFIELD  
Task Force Officer  
Drug Enforcement Administration